

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	CASE NO. 1:15-CR-00316
)	
Plaintiff,)	JUDGE PATRICIA GAUGHAN
)	
vs.)	
)	
ROBERT B. RAY,)	<u>MOTION FOR DETENTION</u>
)	<u>HEARING</u>
)	
Defendant.)	

Now comes Robert B. Ray, by and through undersigned counsel, and hereby respectfully moves this Court to hold a detention hearing in the above-referenced matter. In support of this motion, Mr. Ray presents the following information and argument to the Court.

1. Mr. Ray made his initial appearance in this case on July 30, 2015.
2. On July 31, 2015, an order of temporary detention was entered as to Mr. Ray, pending a detention hearing and preliminary examination scheduled for August 5, 2015.
3. On August 5, 2015, Magistrate Judge White entered an order stating: "Robert B. Ray...waives in open court his right to a detention hearing and consent[s] that he be held without bail pursuant to Title 18 U.S.C., Section 3142 (e) and (i), *with the right to revisit the issue of detention at a later date.*" (*Emphasis added*).
4. On August 26, 2015, an indictment was filed against Robert B. Ray.

5. On September 8, 2015, Mr. Ray was arraigned on the indictment and he entered a plea of not guilty to the indictment, however, the issue of detention was not addressed.
6. On December 15, 2015, a superseding indictment was filed against Robert B. Ray.
7. On January 5, 2016, Mr. Ray was arraigned on the superseding indictment and he entered a plea of not guilty to the superseding indictment, however, once again, the issue of detention was not addressed.
8. Mr. Ray hereby requests that a detention hearing be held to revisit the issue of detention.

WHEREFORE, Mr. Ray respectfully requests this Court to hold a detention hearing in this matter immediately.

Respectfully Submitted,


JACK W. BRADLEY CO., LPA



JACK W. BRADLEY 0007899
MICHAEL E. STEPANIK 0082713
Counsel for Robert B. Ray
520 Broadway, 3rd Floor
Lorain, OH 44052
P: 440-244-1811
F: 440-244-3848

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Detention Hearing was filed electronically this 9 day of February, 2016, in accordance with the Court's Electronic Filing Guidelines. Notice of this filing will be sent to all parties by operation of the Court's Electronic Filing System. Parties may access this filing through the Court's filing system.



Jack W. Bradley